

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: BENEDICT VINCENT SOKOLOWSKI & :	Bankruptcy No.: 5:18-bk-03468-MJC
LYNDA JO SOKOLOWSKI :	
:	CHAPTER 13
:	
Debtors. :	
:	11 U.S.C. § 363(b)
:	Motion to Approve Sale
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**MOTION TO APPROVE SALE**

AND NOW, comes the Debtors, Benedict Vincent Sokolowski and Lynda Jo Sokolowski (heretofore referred to as the “Debtors”), by and through their Attorney, Patrick J. Best, Esquire of ARM Lawyers, who hereby moves this Honorable Court as follows:

1. On August 21, 2018, the Movants filed a Voluntary Chapter 13 Petition with this Honorable Court.
2. The bankruptcy estate included real estate known as 124 Falling Water Court, Bushkill, PA 18324 (the “Property”).
3. Debtors now seek to sell the Property.
4. Debtors previously filed a Motion to Approve Sale (DE # 85) which was ultimately granted (DE # 100); however, the original sale fell through.
5. Debtors now have a new buyer and seek approval of this sale.
6. Debtors intends to sell this Property for \$750,000.00.
7. An Agreement of Sale is attached as Exhibit A.
8. This sale is an arms-length transaction to a third party not affiliated with the Debtors.
9. After paying all administrative expenses, Debtor shall pay all liens and encumbrances on the property.

10. At closing, Debtors also intend to make a lump sum payment to the Chapter 13 Bankruptcy Trustee in the amount of \$110,000.00 consistent with the Stipulation filed at DE # 94 and adopted by Order at DE # 99.
11. Debtor intends to retain all remaining proceeds for the purchase of a residence.
12. A proposed Closing Disclosure is attached as Exhibit B.<sup>1</sup>

**WHEREFORE**, Debtor requests this Honorable Court enter an order approving the sale of the property.

Date: June 24, 2022

/s/ Patrick J. Best  
Patrick J. Best, Esquire  
ARM Lawyers  
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<sup>1</sup> The attached CD does not show the \$110,000 to be paid to the Trustee. Due to the timing requirements of this Motion, Debtors filed with the draft CD. Debtors will provide the updated CD to the Trustee prior to closing and will ensure that the Trustee is paid the \$110,000.00 required.